

US EPA ARCHIVE DOCUMENT



Society

COMMITTEE ON ENVIRONMENTAL IMPROVEMENT
Task Force on Laboratory Waste Management
Peter Reinhardt, Chair

American Chemical

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Mr. Ralph Stuart
University of Vermont
Chemical Safety Coordinator
655 Spear St.
Burlington, VT 05405

Dear Ralph:

On behalf of the American Chemical Society (ACS) Task Force on Laboratory Waste Management (LabWaM), I am writing to encourage the New England Laboratory Consortium for Environmental Excellence (LCEE) in its pursuit of a Project XL Proposal for laboratories at academic institutions.

ACS has always been interested in finding appropriate alternative regulations for laboratories. The Society believes that laboratories should be recognized as unique institutions and that regulations designed for industrial activities are not a good fit. ACS supports the use of performance-based standards for laboratory waste management, the major theme of the LCEE's proposal. Through its policy statements, the Society has encouraged the Environmental Protection Agency (EPA) to work with laboratory stakeholders on such issues as RCRA improvement, the redefinition of "on-site," EPA Permits Improvement Team recommendations, and the Clean Air Act regulation of R&D facilities.

ACS commends your initiative in using Project XL as a strategy to achieve regulatory relief for laboratories. If you would like more information about ACS policy statements, please contact Margaret Carey, ACS staff liaison to LabWaM, at 202/872-4467 or via e-mail at m_carey@acs.org.

Sincerely yours,

Peter Reinhardt